

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: CORE SCIENTIFIC, INC., et al., Debtors.¹	§ § § § §	Chapter 11 Case No.: 22-90341 (DRJ) (Jointly Administered)
---	-----------------------	---

**NOTICE OF APPEARANCE UNDER
FED. R. BANK. P. 9010(b), REQUEST FOR ALL COPIES
PURSUANT TO FED. R. BANKR. P. 2002 AND REQUEST FOR
ALL PLEADINGS PURSUANT TO FED. R. BANKR. P. 3017(a)**

Foundry Digital LLC (“Foundry Digital”) requests that all notices given or required to be given and all papers served or required to be served by U.S. Mail and by email in the above-captioned cases be given to and served upon:

John F. Higgins
M. Shane Johnson
Megan N. Young-John
Porter Hedges LLP
1000 Main Street, 36th Floor
Houston, Texas 77002
Telephone: (713) 226-6000
Facsimile: (713) 226-6248
Email: jhiggins@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com

- and -

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

Kristine G. Manoukian
Abbey Walsh
Peter J. Amend
SCHULTE ROTH & ZABEL LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 756-2000
Facsimile: (212) 593-5944
Email: kristine.manoukian@srz.com
abbey.walsh@srz.com
peter.amend@srz.com

This request encompasses all notices, copies, and pleadings referred to in section 1109(b) of title 11 of the United States Code or in Rules 2002, 3017, or 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including, without limitation, any and all notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements, requests, or applications, and any other documents brought before this Court in these cases, whether formal or informal, written or oral, or transmitted or conveyed by mail, hand delivery, delivery service, email, telephone, fax, telex, or otherwise which affect or seek to affect these cases.

This Notice of Appearance and Request for Notices is not, and shall not be deemed or construed to be, a waiver of any of Foundry Digital’s substantive or procedural rights, including without limitation, Foundry Digital’s rights: (i) to have final orders in noncore matters entered only after de novo review by a United States district judge, (ii) to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) to contest jurisdiction or venue in these cases or in any case, controversy, or proceeding related to these cases, (v) to have documents served in accordance with Bankruptcy Rule 7004 and Rule 4 of the Federal Rules of Civil Procedure, or (vi) to any rights, claims, actions, defenses, setoffs, or recoupments to which Foundry Digital is or may be entitled, under any

agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted this 22nd day of February, 2023.

PORTER HEDGES LLP

/s/ John F. Higgins

John F. Higgins, State Bar No. 09597500
M. Shane Johnson, State Bar No. 24083263
Megan Young-John, State Bar No. 24088700
1000 Main Street, 36th Floor,
Houston, Texas 77002-2764
Telephone: (713) 226-6000
Facsimile: (713) 226-6248
Email: jhiggins@porterhedges.com
sjohnson@porterhedges.com
myoung-john@porterhedges.com

- and -

Kristine G. Manoukian*

Abbey Walsh*

Peter J. Amend*

SCHULTE ROTH & ZABEL LLP

919 Third Avenue
New York, New York 10022
Telephone: (212) 756-2000
Facsimile: (212) 593-5944
Email: kristine.manoukian@srz.com
abbey.walsh@srz.com
peter.amend@srz.com

**Pro Hac Vice Admission Pending*

Counsel to Foundry Digital LLC

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on February 22, 2023.

/s/ John F. Higgins
John F. Higgins